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U.S. Environmental Protection Agency  
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*Submitted electronically via [www.regulations.gov](http://www.regulations.gov)*

RE: Responses to Certain State Designation Recommendations for the 2010 Sulfur Dioxide Primary National Ambient Air Quality Standard: Notification of Availability and Public Comment Period

Docket ID No. EPA-HQ-OAR-2017-0003

Dear Ms. Henigin,

The Minnesota Pollution Control Agency (MPCA) is pleased to submit comments on the U.S. Environmental Protection Agency's (EPA) "Responses to Certain State Designation Recommendations for the 2010 Sulfur Dioxide Primary National Ambient Air Quality Standard: Notification of Availability and Public Comment Period", published in the Federal Register on September 5<sup>th</sup>, 2017 (82 FR 41903) related to EPA's designation recommendations for Sherburne County and Goodhue County. In addition, pursuant to Section 107(d) of the Clean Air Act, and as directed by the July 22, 2016 memorandum "Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard – Round 3," the Minnesota Pollution Control Agency (MPCA), on behalf of Governor Mark Dayton, hereby submits new information to support its revised designation recommendation for Goodhue County for the 2010 one-hour National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>).

In 2010, the Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>) was updated, resulting in a new, lower primary standard (1-hour) and the revocation of the previous 24-hour and annual standards (75 FR 35520, June 22, 2010). After the promulgation of the new primary SO<sub>2</sub> NAAQS, and under the auspices of the Clean Air Act (CAA, as amended), EPA is required to identify areas throughout each state that are in attainment, are in nonattainment, or are unclassifiable for the new NAAQS. EPA published the first round of area designations based on monitoring data that demonstrated immediate violations of the new NAAQS (78 FR 47191, August 5 2013). Due to EPA's failure to designate all areas prior to the June 3, 2013 deadline, lawsuits were filed, resulting in a consent decree requiring EPA to make second and third rounds of designations by July 2, 2016 and December 31, 2017, respectively.

Minnesota had no areas or facilities identified under the criteria for rounds one or two of designations. MPCA submitted its round-three designation recommendations to EPA on January 13, 2017 and an updated designation request for Goodhue County on August 2, 2017. On August 22, 2017, EPA sent Minnesota's Governor Dayton a "120-day letter" describing their proposed area designations for Minnesota. The MPCA has two specific areas of comment related to EPA's proposed designations:

- 1) The MPCA requests that EPA designate Goodhue County as "attainment/ unclassifiable" and is providing additional information and documentation to support this requested designation.
- 2) The MPCA supports EPA's recommended designation of "attainment/ unclassifiable" for Sherburne County. However, the MPCA disagrees with EPA's characterization of some of the modeling files in its "Initial Technical Support Documents for Area Designations Round 3" (TSD), Chapter 20 (Minnesota) relied upon for the designation.

*Goodhue County: New information to support requested designation of "attainment/ unclassifiable"*

With this letter, the MPCA is providing additional documentation to demonstrate that it has addressed the area identified in the 120-day letter as violating the 2010 primary SO<sub>2</sub> NAAQS and requests EPA designate Goodhue County as “attainment/unclassifiable.” In its 120-day letter, EPA stated that “The air dispersion modeling data show either that Goodhue County may be violating the 2010 primary SO<sub>2</sub> NAAQS or contains sources that may be contributing to air quality in a nearby area that may be violating the 2010 primary SO<sub>2</sub> NAAQS, which would require a modification of the recommended designation.” EPA invited Minnesota to review the available information and continue discussions with EPA to inform the final designation.

In its TSD for Minnesota sent with the 120-day letter, EPA stated its intended designation for Goodhue County is nonattainment based on modeling information provided to EPA by a facility located in Goodhue County. On May 1, 2017, USG Interiors LLC Red Wing (USG) located in Goodhue County, Minnesota provided the EPA with an air dispersion modeling report that identified an exceedance of the 2010 1-hour NAAQS for SO<sub>2</sub>. USG conducted this modeling exercise for a reason unrelated to EPA’s SO<sub>2</sub> designation process as USG is not a source that was required to be characterized under EPA’s SO<sub>2</sub> Data Requirements Rule. The modeled exceedance occurred on a portion of unimproved and vacant real estate located at 27321 Highway 61 BLVD, Red Wing, Goodhue County, Minnesota 55066, identified by the Goodhue County’s Assessor’s Office as parcel number R 43-127-0100. MPCA has been working closely with USG and EPA Region 5 to identify a solution to address the modeled exceedance. MPCA sent a letter to EPA on August 2, 2017, discussing the situation, and MPCA stated the following in the letter:

“The MPCA has actively been working with USG to address these modeling results. USG has committed to restricting public access to the area where the predicted exceedance occurred. The access restriction will remove this area from the definition of ambient air. The MPCA will enter into an enforceable agreement with the facility to ensure that this access restriction is in place by September 30, 2017.”

On September 7, 2017, USG submitted to the MPCA its strategy for limiting public access to the area with the modeled exceedance and documentation showing that the restriction has been implemented (Attachment 1 –USG Documentation of Public Access Restriction). On <INSERT DATE>, the MPCA executed an Administrative Order by Consent with USG to remove public access to the area where the predicted exceedance occurred (Attachment 2 – Administrative Order by Consent between MPCA and USG).

Given communications between the MPCA, EPA, and USG, along with the execution of the Administrative Order, the MPCA reaffirms our previous designation recommendation of unclassifiable/attainment for the entirety of Goodhue County.

#### *Sherburne County: Modeling for the SO<sub>2</sub> NAAQS designation*

MPCA supports EPA’s designation of unclassifiable/attainment for the entirety of Sherburne County, and is providing comments on two issues related to the area modeling as a matter of clarification.

In the Technical Support Document for Minnesota, Chapter 20, Section 7.3.7, “Modeling Parameter: Meteorology and Surface Characteristics,” EPA states that “[t]he state used AERSURFACE version 13016. Based on the AERSURFACE input/output files, it appears the AERSURFACE land use characteristics were generated centered on the Sherco plant rather than on the St. Cloud NWS tower site. Guidance in the TAD and in the Region 5 Meteorological Data Processing Protocol both note that the land use characteristics, most importantly the surface roughness, should be based on the NWS tower site” (p. 75).

Based on the Technical Assistance Document for the 1-hr SO<sub>2</sub> Data Requirements Rule (DRR), the most recent three years of meteorological data were used for MPCA’s analysis. Surface observations from St. Cloud NWS ASOS (STC) were obtained and processed for 2013 through 2015 using AERMET v15181. Upper air observations from Chanhassen NWS RAOB (MPX) were obtained and processed for 2013 through 2015, also using AERMET v15181. AERSURFACE data

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processed by MPCA for 2013 for STC was applied to the 2014 and 2015 data. A default threshold wind speed of 0.5 m/s was also applied.

The MPCA would like to clarify that the AERSURFACE file EPA appears to be referring to, "Sherco.OUT", was not the file used in the meteorological data processing. Rather, the "Sherco.OUT" file was used to evaluate the surface roughness of the facility in order to select the most representative meteorological station out of five potential sites. The MPCA would like to refer EPA to the Stage 3 AERMET input file titled "STCMPX1315.IN3", which was provided to EPA in conjunction with our data sets submitted under the SO<sub>2</sub> DRR on January 13, 2017. This file clearly indicates that the "STC\_2013\_AERSURFACE.OUT" file, which is centered on the St. Cloud airport, was used to process the primary surface characteristics for the meteorological data set.

On page 78 of the Technical Support Document, EPA states "[i]t's not clear from the information provided which version of AERMINUTE was used. These data were subsequently integrated into the AERMET processing to produce final hourly wind records of AERMOD-ready meteorological data that better estimate actual hourly average conditions and that are less prone to over-report calm wind conditions."

Version 15272 of AERMINUTE, which was the most recent version at the time of the submittal, was used for data processing. The MPCA would like to refer EPA to the AERMINUTE files provided "aerminute.log" and "AERMINUTE\_hour.dat", which were also submitted under the SO<sub>2</sub> DRR. These files specify in the heading that AERMINUTE Version 15272 was used in the data processing.

As Commissioner of the MPCA, I am duly authorized by the Governor of the State of Minnesota to submit this letter on his behalf. If you have questions or comments on this submission, please contact Mary Jean Fenske of my staff at 651-757-2354.

Sincerely,

John Linc Stine, Commissioner

Enclosures

Cc David Thornton, Assistant Commissioner

<Any Region 5 leadership?>